
*Ontario's
Environmental Leaders Program*

**Application
Guide**

**Refer to this Guide
as you are completing the
*Ontario's Environmental Leaders Program Application form***

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Contents of this document are subject to change without further notice.

Completing Your Application

What does filling out the OEL Application form involve?

The Ontario's Environmental Leaders Program (OEL) Application form is designed to be easy for you to fill out while also providing the Ministry of the Environment (MOE) with enough information to evaluate whether your Facility qualifies for participation in the program.

The Application consists of the following sections:

Instructions These are basic instructions about completing the form.

Company Information

Section A Facility Information

Section B Environmental Management System (EMS) Information

Section C Compliance Performance and Emission Summary and Dispersion Modelling Report

Section D Provincial Priority Reduction Plan (PPRP)

Section E Public Communications and Outreach Activities

Section F Application and Participation Statement

The first 3 sections (Sections A through C) ask you to tell us about your Facility and qualifications. In Sections D and E you will discuss your ongoing commitments. After completing these 5 sections, you will need to complete and sign the Application and Participation Statement (Section F)

This Guide - which follows the same order as the form - should help you complete the Application and answer any questions that you have.

Will I need to provide any confidential business information in the form?

You may have to submit attachments to the form that you consider proprietary and confidential. Information submitted may be claimed as confidential. Non-confidential information obtained by the Government of Ontario through the Application is available to the public, subject to the *Freedom of Information and Protection of Privacy Act*. If you do not claim confidentiality at the time of submitting the information, the Ministry may make the information available to the public without further notice to you.

The *Freedom of Information and Protection of Privacy Act* can be found online:

<http://www.gov.on.ca/MBS/english/publications/statregs/index.html>

What benefits do I get for participating in the program?

Ontario's Environmental Leaders Program offers a suite of incentives to participants for committing to specific reduction targets. Incentives are available upon acceptance into the program. To read about the full suite of incentives available, please look at *Framework for Ontario's Environmental Leaders Program*, which can be found online at:

<http://www.ene.gov.on.ca/envision/general/leadership/index.htm>

What if I have questions about the application process or about the program in general?

Ministry staff are available for consultation at any point during the application process. Included in your application package is the contact information for the project coordinator that is responsible for your Application form. Alternatively, you may contact the following:

Ontario's Environmental Leaders Program
Applications

Ontario Ministry of the Environment
40 St. Clair Avenue West, 12th Floor
Toronto ON M4V 1M2

Phone 416 327-8073

Fax 416 314-7919

e-mail leadership@ene.gov.on.ca

| | | |
|-----------------------------------|---|---|
| <i>Company Information</i> | Company name | Provide the name of the company if your Facility is owned by another company, is a division of a larger company, or is the responsibility of another company. |
| | Business/Facility Name | This is the name under which you are operating. |
| | Corporation/Business Identification Number | This is the number assigned to all registered business names by the Companies Branch of the Ontario Ministry of Consumer and Business Services. |
| | Location of Facility | Give the full location address of the Facility, including Street number and name, Unit/suite if any, City, Province and Postal code. |
| | Mailing Address | Give the full mailing address of the Facility, if it is different from the Location Address, including Street number and name, Unit/suite if any, City, Province and Postal code. |
| | Facility/Company web site | State the URL of the Facility/company web site (if any). |
| | Contact person for the application | State the First and Last Names, Title, Phone, Fax and Email address for the person who may be contacted for additional information about your Facility's application. |

Section A

Facility Information

Why do we need this information?

The Ministry of the Environment needs background information on your Facility to evaluate your application.

What do you need to do?

- Complete the requested background information on your Facility.

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| 1. Describe what is done or made at the Facility. | Briefly describe the primary products that you manufacture, prepare, or assemble at your Facility. For non-manufacturing facilities, describe the services you provide or activities you conduct. |
| 2. Are you a member of an industry association? If yes, please list the association(s). | If you are an active member of one or more industry associations, please list the names of all the associations here. |
| 3. List the North American Industrial Classification system (NAICS) codes used to classify your Facility's business. | If your Facility has more than one NAICS, please list the primary code for the Facility first, followed by all other codes. If you do not know your Facility's classification code, please consult the following website: http://www.statcan.ca/english/concepts/industry.htm |
| 4. Number of full-time employees working at the Facility? | Record the total number of all employees working at the facility. |
| 5. Describe the community where the Facility is situated. | Describe whether you are situated in an industrial park, proximity to residential areas, etc. |
| 6. Provide a legal description of the property where the Facility is located and the ownership of the property. | You may have provided this information to the Ministry for another purpose, i.e. Application for a Certificate of Approval. |
| 7. List all environmental approvals, permits, waste generator registrations and any pending applications at the Facility under the <i>Environmental Protection Act</i> and <i>Ontario Water Resources Act</i> . | |
| 8. Describe your participation in other non-regulatory programs at the local, Provincial, or Federal level, if any. | Describe any non-regulatory programs you are currently involved in, such as challenge programs (VCR, ARET, etc.) or non-regulatory MOUs, etc. |
| 9. Additional information about your Facility. | This item is optional. If there is additional information that you would like to tell us, that isn't asked for in the Application, use this space. |

Section B

Environmental Management System (EMS) Information

Why do we need this information?

Facilities need to have an operating Environmental Management System (EMS) that meets certain requirements

What do you need to do?

- Confirm that your EMS meets the program's requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

In this section, tell us about the environmental management system (EMS) that the Facility has in place. The Environmental Management System for the Facility may take various forms as appropriate to the Facility's organisation. However, the system must conform to generally accepted EMS standards and be acceptable to the Ministry.

In order to satisfy the requirements of this program, the EMS must contain the following elements:

- ☐ clearly defined environmental policies, procedures and goals;
- ☐ a process to identify, document and assess Ministry identified sector priority pollutants as well as Facility-identified priority pollutants;
- ☐ documentation of the procedure and work instructions used in implementing the EMS;
- ☐ adherence, whenever possible, to pollution prevention principles (more information on this element follows this list);
- ☐ a disciplined management system, including roles, responsibilities and accountabilities that are clear to all;
- ☐ communications and outreach appropriate to address internal and external stakeholders, and to make successful implementation of the EMS possible;
- ☐ a day-to-day management system to identify and correct environmental problems;
- ☐ protocols for investigating incidents, providing training, operating and maintaining control equipment, documenting performance, managing compliance and reporting performance;
- ☐ environmental planning for the full range of planned activities;
- ☐ a fully maintained emergency preparedness program;
- ☐ a legislative and regulatory surveillance program to establish and track the requirements and environmental aspects associated with the Facility's activities, products and services;
- ☐ appropriate and sufficient resources, including training, to achieve targeted performance levels on an ongoing basis;
- ☐ issue specific programs to improve performance;
- ☐ a management process to review and audit the EMS.

Adherence to Pollution Prevention Principles

In the context of your EMS, adherence to pollution prevention principles means:

1. Your Environmental Policy should include a commitment to pollution prevention that emphasizes source reduction as the preferred means of addressing your environmental aspects and impacts. In essence, this means subscribing to the environmental hierarchy, in which pollution prevention is the preferred approach, re-use and recycling are next, followed by pollution control/treatment, disposal/destruction, and the least preferred option, remediation and clean-up.
2. A pollution prevention planning process should be integrated into your EMS. This process regularly and systematically examines root causes of all wastes generated, and then identifies and ranks pollution prevention opportunities against criteria of your choosing such as cost, risk, toxicity, environmental impact, compliance, and so on. This planning process can be applied to all aspects identified in your EMS, or could be targeted only to your significant aspects.
3. The objectives and targets established in your EMS should include specific objectives and targets for pollution prevention.

These principles go beyond the requirements of ISO14001, which requires that your Environmental Policy includes “a commitment to continual improvement and prevention of pollution.” **Prevention of Pollution** is defined in ISO as including recycling and control mechanisms, so is not the same as **pollution prevention**.

Pollution Prevention

Pollution prevention seeks to eliminate the causes of pollution rather than treating the symptoms. Pollution Prevention has been defined by the Canadian Council of Ministers of the Environment as follows:¹

The use of processes, practices, materials, products or energy that avoid or minimize the creation of pollutants and wastes, at the source.

Pollution prevention promotes continuous improvement through operational and behavioural changes. Pollution prevention is a shared responsibility among governments and individuals, industrial, commercial, institutional, and community sectors. It focuses on areas such as:

- substances of concern
- efficient use and conservation of natural resources
- operating practices
- clean production processes which create less waste
- training
- equipment modifications
- process changes
- materials and feedstock substitution
- product design and reformulation
- product life-cycle
- purchasing practices

¹A Strategy to fulfil the CCME Commitment to Pollution Prevention, CCME, 1996

The following are additional principles relating to the implementation of pollution prevention that you may wish to incorporate into your environmental policy or practices.

- Prevention should be considered at the earliest possible point in the development of any concepts, plans, products, projects or processes.
- Pollution prevention planning should be a continuing process, incorporating opportunities for improvement on an ongoing basis such as new scientific and technological developments.
- Prevention should be applied throughout the entire life-cycle of a product.

Facilities are responsible to implement their EMS. The following outlines the Plan-Do-Check-Act cycle, and should be used as guidance in discussing your EMS in your application:

Defining and Documenting the EMS

An EMS is an environmental policy endorsed by senior management that commits the Facility to minimising risks to the environment, meeting or exceeding regulatory compliance, and continuous improvement of environmental performance.

Identifying Significant Environmental Aspects and Impacts, and Legal Requirements

This includes a systematic identification of environmental impacts of the Facility's activities, products and services, as well as an identification of its legal and other requirements. Significant environmental aspects should include the following: resource use (energy, water and materials); negative effects (air emissions, water discharges, waste and accidental discharges); product impacts; and resource conservation and preservation.

Setting Measurable Objectives and Targets

Facilities must set objectives and targets to effectively manage the most significant aspects (or the most significant potential impacts), and establish action plans with the appropriate responsibilities and resources assigned to meet these objectives and targets.

Establishing Roles and Responsibilities for Meeting EMS and Legal Requirements

This step involves the engagement of employees by clearly defining and communicating roles and responsibilities, identifying and meeting training needs and establishing effective communication mechanisms. Furthermore, facilities must conduct training for personnel on EMS and legal requirements.

Evaluating Progress in Meeting the Established Objectives and Targets

Facilities are required to undertake steps and implement management processes to meet the established objectives and targets. An emphasis on continuous improvement through monitoring and tracking performance of key environmental aspects is critical. Resulting plans should include the following elements:

- Structure and responsibility
- Employee training and awareness
- Ensure the presence of individuals with required skills
- Communication, including local-area stakeholders
- Environmental management system documentation
- Document control
- Operational control
- Emergency preparedness and response plans

Installing a Compliance Tracking System

The compliance tracking system will ensure that Facility management verify all regulatory requirements and the presence of systems that meet those requirements, on a regularly scheduled basis.

Completing a Compliance Audit

Facilities must verify their regulatory compliance and EMS functioning through the regular maintenance of documentation and records.

Correcting Areas of EMS Non-Conformance or Legal Non-Compliance

This requires continuous improvement through monitoring and tracking performance of key environmental aspects; implementing external audits to detect non-conformance and the effective functioning of the EMS; and prompt corrective actions.

Completing a Management Review of the EMS, and Results

There should be demonstrated involvement of senior management in reviewing environmental performance against objectives and targets, implementation of action plans, and the results of previous audits and reviews to ensure the EMS evolves to meet changing circumstances.

Section C

Compliance Performance and Emission Summary and Dispersion Modelling Report

Why do we need this information?

Participants must demonstrate a sustained record of environmental compliance in order to qualify for entry into Ontario's Environmental Leaders Program.

The ESDM confirms compliance with air emissions and also serves to inform the target setting process.

What do you need to do?

- Complete (if not already done) and submit an Emission Summary and Dispersion Modelling Report.
- Tell us about your compliance-related behaviour.

- 1. The approvals and permits listed in Section A of this Application are in good standing with the Ministry. Describe any exceptions below.**

In Section A you were asked to list all environmental approval/permits at the Facility under the *Environmental Protection Act* and the *Ontario Water Resources Act*. You were also asked to list ongoing permit issues. Please verify here that all such approvals/permits are in good standing with the Ministry.
- 2. List all environmental charges, convictions, fines, Ministry-issued Control Documents and any litigation involving environmentally related matters at the Facility for the past five years.**

If this applies to your Facility, state details, including dates, of infractions.
- 3. Describe any Ministry-approved plan in place to address any incidents of non-compliance. Confirm that you are in compliance with all Control Documents.**

If there are known incidents of non-compliance at the Facility, for which there is a Ministry-approved plan in place, please describe them here, including the expected date of compliance. An example of a Ministry-approved plan is a mandatory abatement measure such as a control document, or a voluntary abatement measure such as a program approval.
- 4. Do you intend to apply for an enhanced comprehensive site-wide certificate of approval?**

This item is optional. If you anticipate applying for an enhanced comprehensive site-wide certificate of approval (available only to OEL participants), answer "Yes". Otherwise, answer "No". Answer this question to the best of your knowledge at the present time. You are not bound to this decision.
- 5. Please submit a copy of your Emission Summary and Dispersion Modelling Report (ESDM) with your Application.**

As a supplement to your ESDM, please complete the following Emission Summary and Dispersion Modelling Information Checklist.

Detailed information on preparing an ESDM, including the Checklist, is contained in the MOE document *Procedure for Preparing an Emission Summary and Dispersion Modelling Report*, which can be found on the Ministry's website at: <http://www.ene.gov.on.ca/envision/gp/361401e.pdf>

You may have recently submitted an ESDM to the Ministry for another purpose. If this is the case, and there have been no substantial changes at your Facility that would warrant a new ESDM, then resubmission of the same ESDM Report is acceptable.

Section D

Provincial Priority Reduction Plan

Why do we need this information?

The PPRP documents the substances and reduction targets that you are committing to, and your plan for achieving your commitment.

What do you need to do?

- Fill in the PPRP Table (Part A) for each commitment, and complete Part B and Part C.

1. Summary of Commitments

Fill in the table, listing the substance names across the top and completing the commitment information requested for each substance. If you are committing to reduce **more than 5 substances**, please attach a separate sheet; or, if you are completing the form electronically, duplicate the table by following the instructions on the form.

Substances selected for reduction can include releases to any/all media including the release of a substance directly or indirectly into a water body, the release of a substance to the air, or releases classified as waste.

2. Selection of Commitments

Describe the following:

- *The method used to determine substances and targets.*
Explain how you selected the substance and how you determined the target. Examples of selection methods include: risk management analysis, analysis of aspects and impacts identified in EMS, etc.
- *Whether or not the substances are identified as significant in your EMS.*
If you did not use an analysis of your EMS to determine targets, identify here whether the substance is in fact, identified as significant in your EMS.
- *Whether or not any site-specific or local issues influenced the selection of any substance(s).*
Explain any site-specific or local issues or pressures that contributed to the selection of any substance(s).

3. Implementation Plan

For each substance, explain how you plan to **achieve the reduction target** (i.e. equipment upgrade, pollution prevention, etc.), and the **timetable for implementation** (i.e. equipment installation in third year of the agreement). If there will be incremental reductions over the course of the agreement, describe interim target(s). You will be reporting progress annually against this implementation plan, so be as specific as possible.

In the second and fifth years of the agreement, you will have your progress report verified by a third party. Explain what verification method you are likely to use (i.e. add performance verification component to ISO 14001 audit, hire an external environmental consultant, etc.). You are not bound to this method by identifying it here.

Section E

Public Communications and Outreach Activities

Why do we need this information?

Facilities need to demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

What do you need to do?

- Describe your approach to public outreach.

- | | |
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| 1. Describe how you identify and respond to community concerns. | Briefly describe how you identify and respond to community concerns. For example, "We hold an open house every six months to discuss issues with the community," or "We have an employee who takes calls from community members." |
| 2. Describe how you inform community members of important matters that affect them. | Briefly describe how you inform community members of important matters. For example, "We send out a monthly newsletter detailing important issues." |
| 3. Describe how you will communicate your participation in the program to your community and stakeholders. | Identify how you propose to undertake two-way communication with individuals and groups in the local area as well as those interested in the activities of the Facility. |
| 4. How will you make your Environmental Leaders Program annual performance report available to the public? | Identify how you will most likely distribute your Environmental Leaders Program annual performance report available to the public, by checking one or more of the boxes. If you will be using a web site, provide the URL. If "Other," please describe what will be done. |

Section F
Application and
Participation
Statement

The Application and Participation Statement must be signed by the senior Facility manager. It is certification that the information in the Application is accurate and complete, and binds the Facility to participate in good faith.